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ENGINEERING CONSULTANT

June 29, 2015

ARTHUR BLOOSTON  
1914 - 1999

ORIGINAL

WRITER'S CONTACT INFORMATION  
sta@bloostonlaw.com  
202-828-5562

REDACTED - FOR PUBLIC INSPECTION

VIA HAND DELIVERY

Accepted / Filed

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

JUN 29 2015

Federal Communications Commission  
Office of the Secretary

RE: Form 481 - Carrier Annual Reporting Data Collection, 2015  
WC Docket No. 14-58

Dear Ms. Dortch:

Pursuant to sections 54.313(i) and 54.422(c) of the Commission's Rules,<sup>1</sup> Peñasco Valley Telephone Cooperative, Inc. (PVT) hereby submits a copy of its "FCC Form 481 - Carrier Annual Reporting Data Collection Form," as filed with the Universal Service Administrative Company. A copy is also being submitted to the appropriate state regulatory commission and tribal government, as further required by sections 54.313(i) and 54.422(c).

Pursuant to the Protective Order adopted by the Commission in this proceeding,<sup>2</sup> PVT requests confidential treatment for the financial information included in its report, as required by §54.313(f)(2), on the grounds that it is commercially sensitive information that is not normally released to the public. PVT also requests confidential treatment for its Progress Report on the

<sup>1</sup> 47 CFR §§54.313 and 54.422.

<sup>2</sup> In the Matter of Connect America Fund, et al., PROTECTIVE ORDER, WC Docket No. 10-90, et al., DA 15-712, released June 17, 2015.

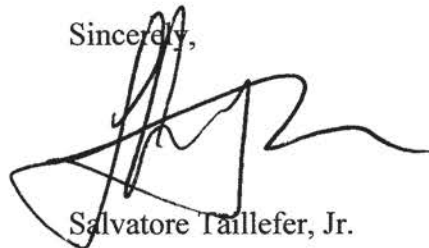
No. of Copies rec'd 0+1  
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Five Year Service Quality Plan pursuant to sections 0.457 and 0.459 of the Commission's Rules. A letter in support of PVT's request is attached hereto.

In accordance with the Protective Order and the Commission's rules, two redacted copies and one non-redacted copy have been submitted on paper via hand delivery to the Secretary's Office, two non-redacted copies have been submitted for hand delivery to Mr. Charles Tyler of the Telecommunications Access Policy Division, and a redacted copy has also been filed via the Electronic Comment Filing System.

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read 'Salvatore Taillefer, Jr.', with a stylized, flowing script.

Salvatore Taillefer, Jr.  
Counsel to Peñasco Valley  
Telephone Cooperative, Inc.

CC:

Mr. Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau

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DIRECTOR OF ENGINEERING

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**JUN 29 2015**

Federal Communications Commission  
Office of the Secretary

RE: Form 481 - Carrier Annual Reporting Data Collection, 2015  
WC Docket No. 14-58

Dear Ms. Dortch:

Pursuant to §0.457 and §0.459 of the Commission's rules, Peñasco Valley Telephone Cooperative, Inc. ("PVT"), by its attorneys, hereby requests that certain materials and information be withheld from public inspection. Specifically, PVT requests confidential treatment of the Progress Report on the Five Year Service Quality Improvement Plan (the "Plan" or "confidential information") attached to its Form 481 filing.

In support of its request for confidential treatment and pursuant to the requirements under § 0.459(b) of the Commission's rules, PVT states the following:

*1. Identification of the specific information for which confidential treatment is sought.*

PVT seeks confidential treatment of the Progress Report on the Five Year Service Quality Improvement Plan, attachment 492270NM112 to the Form 481 filing accompanying this letter, which contains sensitive financial information about PVT as well as information about PVT's projected network improvements and upgrades for voice and broadband services during the period from 2015 through 2019.

2. *Identification of the Commission proceeding in which the information was submitted or description of the circumstances giving rise to the submission.*

The documents are being submitted as part of the annual Eligible Telecommunications Carrier Report (Form 481) mandated by section 54.313 of the Commission's rules.

3. *Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.*

The data described is highly confidential and sensitive commercial and financial information which constitutes trade secrets or sensitive commercial and financial information that "would customarily be guarded from competitors,"<sup>1</sup> and is therefore exempted from mandatory disclosure under FOIA Exemption 4 and Section 0.457(d) of the Commission's rules.<sup>2</sup>

4. *Explanation of the degree to which the information concerns a service that is subject to competition.*

The Plan relates to voice and broadband services provided by PVT that are subject to competition from competitive local exchange carriers, cable television system operators, electric power utilities, fixed and mobile wireless service providers, and/or satellite carriers.

5. *Explanation of how disclosure of the information could result in substantial competitive harm.*

Disclosure of the confidential information is likely to result in substantial competitive harm to PVT because the confidential information could provide competitors with commercially sensitive insights related to PVT's operations, service offerings, and costs.

6. *Identification of any measures taken by the submitting party to prevent unauthorized disclosure.*

PVT does not make the Progress Report on the Five Year Service Quality Improvement Plan or any of the information contained therein publically available in any way, and further limits internal access to key employees subject to strict non-disclosure obligations.

7. *Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.*

PVT does not make the confidential information available to the public and it has not previously allowed disclosure of the confidential information to third parties that are not otherwise bound by confidentiality obligations.

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<sup>1</sup> *Id.* § 0.457(d)(2).

<sup>2</sup> 5 U.S.C. § 552(b)(4); 47 C.F.R. § 0.457(d).

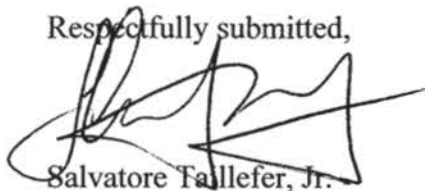
8. *Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.*

The confidential information should be treated as confidential for an indefinite period, as PVT will always be subject to competition and the competitive harms associated with the disclosure of the confidential information.

In order to provide adequate protection from public disclosure, the Commission should strictly limit distribution of the confidential information within the Commission on a "need to know" basis and not allow any distribution outside of the Commission. In the event that any person or entity outside the Commission requests disclosure of the confidential information, PVT requests that it be so notified immediately so that it can oppose such request or take other action to safeguard its interests as it deems necessary.

Please direct any questions regarding this submission to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Salvatore Fallefer, Jr.', written over the printed name.

Salvatore Fallefer, Jr.

Counsel for

Peñasco Valley Telephone Cooperative, Inc.



<b>FCG Form 491 - Carrier Annual Reporting</b> Data Collection Form	FCC Form 491 OMB Control No. 3060-0086/OMB Control No. 3060-0015 July 2013
--	--

<b>&lt;010&gt; Study Area Code</b>	492270	Accepted / Filed
<b>&lt;015&gt; Study Area Name</b>	PENASCO VALLEY TEL	
<b>&lt;020&gt; Program Year</b>	2016	
<b>&lt;030&gt; Contact Name: Person USAC should contact with questions about this data</b>	Jay Umphlett	JUN 29 2015
<b>&lt;035&gt; Contact Telephone Number: Number of the person identified in data line &lt;030&gt;</b>	5757481241 ext. 2270	Federal Communications Commission Office of the Secretary
<b>&lt;039&gt; Contact Email Address: Email of the person identified in data line &lt;030&gt;</b>	jumphlett@pvt.com	

<b>ANNUAL REPORTING FOR ALL CARRIERS</b>	54.313 Completion Required	54.422 Completion Required
--	----------------------------------	----------------------------------

<b>&lt;100&gt; Service Quality Improvement Reporting</b>	(complete attached worksheet)	<input checked="" type="checkbox"/>
<b>&lt;200&gt; Outage Reporting (voice)</b>	(complete attached worksheet)	<input checked="" type="checkbox"/>
<b>&lt;210&gt;</b> <input checked="" type="checkbox"/> ← check box if no outages to report		<input checked="" type="checkbox"/>
<b>&lt;300&gt; Unfulfilled Service Requests (voice)</b>	1 492270NM310.pdf	<input checked="" type="checkbox"/>
<b>&lt;310&gt; Detail on Attempts (voice)</b>	(attach descriptive document)	<input checked="" type="checkbox"/>
<b>&lt;320&gt; Unfulfilled Service Requests (broadband)</b>	0	<input checked="" type="checkbox"/>
<b>&lt;330&gt; Detail on Attempts (broadband)</b>	(attach descriptive document)	<input type="checkbox"/>
<b>&lt;400&gt; Number of Complaints per 1,000 customers (voice)</b>		<input checked="" type="checkbox"/>
<b>&lt;410&gt; Fixed</b>	0.0	<input checked="" type="checkbox"/>
<b>&lt;420&gt; Mobile</b>	0.0	<input checked="" type="checkbox"/>
<b>&lt;430&gt; Number of Complaints per 1,000 customers (broadband)</b>		<input checked="" type="checkbox"/>
<b>&lt;440&gt; Fixed</b>	0.0	<input checked="" type="checkbox"/>
<b>&lt;450&gt; Mobile</b>	0.0	<input checked="" type="checkbox"/>
<b>&lt;500&gt; Service Quality Standards &amp; Consumer Protection Rules Compliance</b>	(check to indicate certification)	<input checked="" type="checkbox"/>
<b>&lt;510&gt;</b>	(attached descriptive document)	<input checked="" type="checkbox"/>
<b>&lt;600&gt; Functionality in Emergency Situations</b>	(check to indicate certification)	<input checked="" type="checkbox"/>
<b>&lt;610&gt;</b>	(attached descriptive document)	<input checked="" type="checkbox"/>
<b>&lt;700&gt; Company Price Offerings (voice)</b>	(complete attached worksheet)	<input checked="" type="checkbox"/>
<b>&lt;710&gt; Company Price Offerings (broadband)</b>	(complete attached worksheet)	<input checked="" type="checkbox"/>
<b>&lt;800&gt; Operating Companies and Affiliates</b>	(complete attached worksheet)	<input checked="" type="checkbox"/>
<b>&lt;900&gt; Tribal Land Offerings (Y/N)?</b>	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>
<b>&lt;1000&gt; Voice Services Rate Comparability Certification</b>	Yes	<input checked="" type="checkbox"/>
<b>&lt;1010&gt;</b>	(attach descriptive document)	<input checked="" type="checkbox"/>
<b>&lt;1100&gt; Certify whether terrestrial backhaul options exist (Yes or No)</b>	(if not, check to indicate certification)	<input type="checkbox"/>
<b>&lt;1110&gt;</b>	(complete attached worksheet)	<input type="checkbox"/>
<b>&lt;1200&gt; Terms and Condition for Lifeline Customers</b>	(complete attached worksheet)	<input checked="" type="checkbox"/>

<b>Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet</b>		
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers		
<b>&lt;2000&gt;</b>	(check to indicate certification)	<input type="checkbox"/>
<b>&lt;2005&gt;</b>	(complete attached worksheet)	<input type="checkbox"/>
<b>Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet</b>		
<b>&lt;3000&gt;</b>	(check to indicate certification)	<input checked="" type="checkbox"/>
<b>&lt;3005&gt;</b>	(complete attached worksheet)	<input checked="" type="checkbox"/>

(100) Service Quality Improvement Reporting  
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jay Umphlett
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481241 ext.2270
<039>	Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pvt.com
<110>	Has your company received its ETC certification from the FCC?	(yes / no) <input type="radio"/> <input checked="" type="radio"/>
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no) <input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

- <112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

492270NM112.pdf, 492270NM112MAP.pdf

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets  
 <114> Report how much universal service (USF) support was received  
 <115> How much (USF) was used to improve service quality and how support was used to improve service quality  
 <116> How much (USF) was used to improve service coverage and how support was used to improve service coverage  
 <117> How much (USF) was used to improve service capacity and how support was used to improve service capacity  
 <118> Provide an explanation of network improvement targets not met in the prior calendar year.

Yes
Yes
Yes
Yes
Yes
Not Applicable

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<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jay Umphlett
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757491241 ext.2270
<039>	Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pvt.com

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<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jay Umphlett
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481241 ext.2270
<039>	Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pvt.com

[illegible]

<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jay Umphlett
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481241 ext. 2270
<039>	Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pvt.com

Page 5

800 Operating Companies  
Data Collection Form  
OMB Control No. 3060-0985/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jay Umphlett
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481241 ext.2270
<039>	Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pvt.com
<810>	Reporting Carrier	Penasco Valley Telephone Cooperative, Inc.
<811>	Holding Company	Penasco Valley Telephone Cooperative, Inc.
<812>	Operating Company	Penasco Valley Telephone Cooperative, Inc.

[illegible]



(900) Tribal Lands Reporting  
Data Collection Form

ECR Form 451  
OMB Control No. 3060-0586/OMB Control No. 3060-0819  
10/2013

<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jay Umphlett
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481241 ext. 2270
<039>	Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pvt.com

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

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**(3100) No Terrestrial Backhaul Reporting  
Data Collection Form**

FCC Form 487

OMB Control No. 3066-0086/OMB Control No. 3066-0819

July 2013

<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jay Umphlett
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481241 ext.2270
<039>	Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pvt.com

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

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(1200) Terms and Condition for Lifeline Customers  
Lifeline  
Data Collection Form

FD-306 (Rev. 4-81)  
OMB Control No. 3060-0985 OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jay Umphlett
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481241 ext. 2270
<039>	Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pvt.com

492270NM1210.pdf

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP [www.pvt.com](http://www.pvt.com)

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- |        |   |                                     |
|--------|---|-------------------------------------|
| <1221> | Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | <input checked="" type="checkbox"/> |
| <1222> | Details on the number of minutes provided as part of the plan,  | <input checked="" type="checkbox"/> |
| <1223> | Additional charges for toll calls, and rates for each such plan.  | <input checked="" type="checkbox"/> |

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(2000) Price Cap Carrier and Network Documentation		ICC Form 481
Data Collection Form		OMB Control No. 3060-0035/OMB Control No. 3060-0819
Including: Lists of Return Carriers Affiliated with Price Cap Local Exchange Carriers		1/1/2015

<010>	Study Area Code	492270
<015>	Study Area Name	
<020>	Program Year	PENASCO VALLEY TEL
<030>	Contact Name - Person USAC should contact regarding this data	2016
<035>	Contact Telephone Number - Number of person identified in data line <030>	Jay Umphrett
<039>	Contact Email Address - Email Address of person identified in data line <030>	3137481241 ext. 2270
		jumphrett@pvt.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

**Incremental Connect America Phase I reporting**

- <2010> 2nd Year Certification (47 CFR § 54.313(b)(1)i)  
 <2011a> 3rd Year Certification (47 CFR § 54.313(b)(1)ii)  
 <2011b> Attachment (47 CFR § 54.313(b)(1)ii)


Name of Attached Document(s) Listing Required Information

**Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))**

- <2012> 2013 Frozen Support Calculation (47 CFR § 54.313(c)(1))  
 <2013> 2014 Frozen Support Calculation (47 CFR § 54.313(c)(2))  
 <2014> 2015 Frozen Support Calculation (47 CFR § 54.313(c)(3))  
 <2015> 2016 and future Frozen Support Calculation (47 CFR § 54.313(c)(4))


**Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))**

- <2016> Certification Support Used to Build Broadband

--

**Connect America Phase II Reporting (47 CFR § 54.313(e))**

- <2017> 3rd year Broadband Service Certification  
 <2018> 5th year Broadband Service Certification  
 <2019> Interim Progress Certification  
 <2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.


- <2021> Interim Progress Community Anchor Institutions


Name of Attached Document(s) Listing Required Information

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REDACTED - FOR PUBLIC INSPECTION



3000 Rate Of Return Carrier Additional Documentation		FCC Form 481
Data Collection Form		OMB Control No. 3080-0066/OMB Control No. 3040-0011
		Rev. 2013

<010> Study Area Code 492270  
 <015> Study Area Name PENASCO VALLEY TEL  
 <020> Program Year 2016  
 <030> Contact Name - Person USAC should contact regarding this data Jay Umphlett  
 <035> Contact Telephone Number - Number of person identified in data line <030> 5757481241 ext. 2270  
 <039> Contact Email Address - Email Address of person identified in data line <030> jumphlett@pyt.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010) Progress Report on 5 Year Plan  
 Milestone Certification (47 CFR § 54.313(f)(1)(i))  
 492270NM3010.pdf  
 Name of Attached Document Listing Required Information

(3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. ☒

(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))  
 492270NM3012.pdf  
 Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2)) (Yes/No) ☒ Yes ☒ No  
 (3014) If yes, does your company file the RUS annual report (Yes/No) ☒ Yes ☒ No

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers) ☒  
 (3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☒

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation  
 492270NM3017.pdf  
 Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, is your company audited? (Yes/No) ☒ Yes ☒ No

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains  
 (3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications ☐

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☐

(3021) Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit ☐

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers, ☐

(3023) Underlying information subjected to a review by an independent certified public accountant ☐

(3024) Underlying information subjected to an officer certification. ☐

(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☐

(3026) Attach the worksheet listing required information  
 Name of Attached Document Listing Required Information

REDACTED - FOR PUBLIC INSPECTION

REDACTED - FOR PUBLIC INSPECTION



(300) Rate Of Return Carrier Additional Documentation (Continued)		QC Form 48
Data Collection Form		OMB Control No. 3060-0566/OMB Control No. 3060-0573
		7/1/2018

<010> Study Area Code	492270
<015> Study Area Name	PENASCO VALLEY TEL
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Jay Umphlett
<035> Contact Telephone Number - Number of person identified in data line <030>	5757491241 ext. 2270
<039> Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pvt.com

## Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Certification Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	492270
<015> Study Area Name	PENASCO VALLEY TEL
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Jay Umphlett
<035> Contact Telephone Number - Number of person identified in data line <030>	5757481241 ext. 2270
<039> Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pvt.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: PENASCO VALLEY TEL	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/26/2015
Printed name of Authorized Officer: Kevin Bartley	
Title or position of Authorized Officer: CFO	
Telephone number of Authorized Officer: 5757481241 ext.	
Study Area Code of Reporting Carrier: 492270	Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agents / Carrier Data Collection Form	PCC Form 481 OMB Control No. 3050-0586/OMB Control No. 3050-0819 July 2013
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<010> Study Area Code	492270
<015> Study Area Name	PENASCO VALLEY TEL
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Jay Umphlett
<035> Contact Telephone Number - Number of person identified in data line <030>	5757481241 ext.2270
<039> Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pvt.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: _____	
Signature of Authorized Officer: _____	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: _____	
Name of Authorized Agent or Employee of Agent: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Printed name of Authorized Agent or Employee of Agent: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments



<701> Residential Local Service Charge Effective Date  
<702> Single State-wide Residential Local Service Charge

1/1/2015

<703>

[illegible]

REDACTED - FOR PUBLIC INSPECTION

REDACTED - FOR PUBLIC INSPECTION

<010>	Study Area Code	492270
<015>	Study Area Name	PENASCO VALLEY TEL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jay Umphlett
<035>	Contact Telephone Number - Number of person identified in data line <030>	5757481241 ext.1241
<039>	Contact Email Address - Email Address of person identified in data line <030>	jumphlett@pvt.com

[illegible]

REDACTED - FOR PUBLIC INSPECTION

REDACTED - FOR PUBLIC INSPECTION

<810>	Reporting Carrier	Penasco Valley Telephone Cooperative, Inc.
<811>	Holding Company	Penasco Valley Telephone Cooperative, Inc.
<812>	Operating Company	Penasco Valley Telephone Cooperative, Inc.

PVT Networks, Inc.		Penasco Valley Telecommunications
Fuego Wireless, LLC		
PVT Wireless, LP		

PENASCO VALLEY TELEPHONE COOPERATIVE, INC.

LINE 112: PROGRESS REPORT ON 5-YEAR PLAN

492270NM112

**REDACTED IN ENTIRETY**



PENASCO VALLEY TELEPHONE COOPERATIVE, INC.

LINE 310: UNFULFILLED SERVICE REQUESTS

492270NM310

**REDACTED IN ENTIRETY**

492270NM510

Peñasco Valley Telephone Cooperative, Inc.  
Study Area: 492270

**Voice Network**

Pursuant to 47 C.F.R. § 54.313(a)(5) and or 47 C.F.R. § 54.422(b)(3) Peñasco Valley Telephone Cooperative, Inc. ("ILEC") is in compliance with appropriate FCC Service Quality Standards and Consumer Protection Rules. ILEC provides CPNI training to all of its new employees and in addition trains all of its existing employees on an annual basis. ILEC also conducts subscriber outreach regarding CPNI by placing CPNI explanation onto its website at [www.pvt.com](http://www.pvt.com) which informs subscribers about CPNI rules and other applicable customer rights and obligations. In addition ILEC trains staff on Red Flag issues on an annual basis. All company employees are required to sign and acknowledge that they have completed CPNI and Red Flag training and understand obligations to adherence of applicable rules.

ILEC also outlines its rates, terms, and conditions under which ILEC offers service in its Local Exchange Tariff. The tariff explains customer rights and obligations, customer service, dispute resolution, deposits, billing and payment options, disconnection of service as well as cancellation of service options. ILEC keeps its tariffs available for public inspection at its business offices.

**Broadband Network**

Pursuant to 47 C.F.R. § 54.313(a)(5) and or 47 C.F.R. § 54.422(b)(3) ILEC is in compliance with applicable FCC Service Quality Standards and Consumer Protection Rules. ILEC trains staff on applicable rules for broadband services issues on an annual basis. In addition ILEC has placed on its website at [www.pvt.com](http://www.pvt.com) its network practices and policies regarding broadband.

ILEC also outlines its rates, terms, and conditions under which ILEC offers Broadband service in NECA Tariff #5 to Internet Service Providers ("ISP"). The Tariff explains customer rights and obligations, customer service, dispute resolution, deposits, billing and payment options, disconnection of service as well as cancellation of service options. Public inspection of NECA Tariff #5 can be found on NECA's website. Retail DSL rates, terms, and conditions for retail services are provided by the ISP.

492270NM610

Peñasco Valley Telephone Cooperative, Inc.  
Study Area: 492270

Functionality in Emergency Situations:

**Voice Network**

Pursuant to 47 C.F.R. § 54.313(a)(6) and 47 C.F.R. § 54.22(b)(4) as set forth in 47 C.F.R. § 54.202(a)(2) Peñasco Valley Telephone Cooperative, Inc. ("ILEC") meets the requirements to remain functional in emergency situations and has the following capabilities: Back-up power is provided to ILEC central offices by use of a generator and batteries that provide it with 8 to 12 hours of emergency power. In addition, ILEC field electronics have 8 to 12 hours of back-up power by use of generators and batteries. ILEC also has SONET, DWDM, and MPLS technology deployed in its core fiber optic network that is a self-healing and will automatically reroute traffic should a fiber cut occur. ILEC has also sufficient spare cards for its fiber optic network to provide almost instantaneous replacement should there ever be a card failure in the core network. ILEC also has proper staff in place to repair any fiber cuts in a timely manner. ILEC has connectivity with neighboring telephone exchanges as well as the LATA tandem to provide diverse options to reroute traffic should an emergency arise. ILEC has developed and trained its staff on network preparedness plans in case of emergency situations. ILEC is prepared and capable of managing traffic spikes resulting from emergency situations and has sufficient switching capabilities to handle such situations.

**Broadband Network**

Pursuant to 47 C.F.R. § 54.313(a)(6) and 47 C.F.R. § 54.22(b)(4) as set forth in 47 C.F.R. § 54.202(a)(2) Peñasco Valley Telephone Cooperative, Inc. ("ILEC") meets the requirements to remain functional in emergency situations and has the following capabilities: Back-up power is provided to ILEC central offices by use of a generator and batteries that provide it with 8 to 12 hours of emergency power that is also used to provide service to the broadband network. In addition, ILEC field electronics have 8 to 12 hours of back-up power by use of generators and batteries. ILEC also has SONET, DWDM, and MPLS technology deployed in its core fiber optic network that is a self-healing and will automatically reroute broadband traffic should a fiber cut occur. ILEC has also sufficient spare cards for its fiber optic network to provide almost instantaneous replacement should there ever be a card failure in the core network. ILEC also has proper staff in place to repair any fiber cuts in a timely manner. ILEC has connectivity with neighboring telephone exchanges as well as the LATA tandem to provide diverse options to reroute traffic should an emergency arise. ILEC has developed and trained its staff on network preparedness plans in case of emergency situations.

492270NM1010

Peñasco Valley Telephone Cooperative, Inc.  
Study Area: 49-2270

### Voice Services Comparability Report

Pursuant to 47 C.F.R. § 54.313 (a) (10) Peñasco Valley Telephone Cooperative, Inc. ("PVT") is in compliance with the requirement that voice services is no more than two standard deviations above the national average urban rate for voice service of \$47.48 as specified in Public Notice DA 15-470 issued on April 16, 2015. PVT's current total local end-user rate<sup>1</sup> of \$16.48 (which includes a local fee of \$16.00, mandated state fees of \$.48 and mandatory extended area service charges of \$0) is not above the standard deviation as specified in the USF/ICC Transformation Order.<sup>2</sup>

<sup>1</sup> Local End User Rate as defined in USF/ICC Transformation Order 26 FCC Rcd at 17751, Para. 238

<sup>2</sup> USF/ICC Transformation Order, 26 FCC Rcd at 17694, Para. 84 (footnote included) "The standard deviation is a measure of dispersion. The sample standard deviation is the square root of the sample variance. The sample variance is calculated as the sum of the squared deviations of the individual observations in the sample of data from the sample average divided by the total number of observations in the sample minus one. In a normal distribution, about 68 percent of the observations lie within one standard deviation above and below the average and about 95 percent of the observations lie within two standard deviations above and below the average."



## Telephone Assistance Application Form For New Mexico

Name \_\_\_\_\_  
(First) (Middle) (Last)Address \_\_\_\_\_  
(Street) (City) (State) (Zip)

Home Telephone Number: \_\_\_\_\_

**PLEASE FILL OUT PART A - OR - PART B. DO NOT FILL OUT BOTH.**A: I, or a member of my household, currently participate in the following program(s): **Check all that apply**

- ☐ Federal Public Housing Assistance or Section 8  
☐ Low Income Home Energy Assistance Program (LIHEAP)  
☐ Medicaid  
☐ National School Lunch free lunch program
- ☐ Supplemental Nutrition Assistance Program (formerly Food Stamps)  
☐ Supplemental Security Income (SSI)  
☐ Temporary Assistance for Needy Families (TANF)

B: If you **DO NOT** participate in one of the programs listed above, you may qualify for telephone assistance based on the size and income level of your household. Please check the box below which applies to your household and attach one of the supporting documents described to the right:

Size of Household (Please check box)	Annual Household Income (135% of Federal Poverty Level)	Acceptable Types of Income Documentation (Please attach a copy of one of these documents)
1	\$15,890	Previous Year State/Federal or Tribal Tax Return
2	\$21,506	Veterans Administration statement of benefits
3	\$27,122	Social Security Administration statement of benefits
4	\$32,738	Retirement/pension statement of benefits
5	\$38,354	Unemployment/Workers Compensation statement of benefits
6	\$43,970	Current year-to-date earnings statement from an employer or 3 consecutive months of pay stubs
7	\$49,586	Federal or tribal notice of participation in Bureau of Indian Affairs General Assistance
8	\$55,202	Divorce decree or child support wage assignment statement
No. _____	Add \$5,616 for each additional person	

If you have telephone service with more than one company, you must select which company you would like to receive the Lifeline assistance from. You may not receive Lifeline from more than one company.

I agree to notify my phone company when I or a member of my household no longer participates in any of the above qualifying public assistance programs or when there has been a change in my family size or income level.

I certify under penalty of perjury the above information is true and that I am not receiving Lifeline credits on any other telephone account. I have read the information on this application and understand I must meet the above qualifications to receive Telephone Assistance (Lifeline).

Signature \_\_\_\_\_

Date \_\_\_\_\_

# NEW MEXICO TELEPHONE ASSISTANCE PROGRAM



4\_01\_15

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REDACTED - FOR PUBLIC INSPECTION



# Low Income Telephone Assistance Program

## Available Programs

Every person in America should have access to quality, affordable telecommunications service. This principle of **Universal Service** has been the goal of the telecommunications industry for decades. In 1934, the federal government codified the goal and reaffirmed it in 1996 by establishing policies for the **preservation and advancement of Universal Service**.

To achieve the Universal Service goal, carriers have access to a fund that is generated by contributions from the telecommunications providers in the United States. Telecommunications companies draw from the fund to provide for programs that support telecommunications services nationwide. The **Lifeline Assistance Program** (Lifeline) is part of the Fund's Low-Income Program as described in this brochure. **Toll Denial Service** is another program available to low income subscribers to help them control what they spend on telephone service.

**Lifeline and Toll Limitations Service Support** provide discounts to eligible low-income consumers to help them maintain telephone service.

## Services Offered

**Basic monthly service is \$16.00 per month, which includes:**

- Unlimited Local Calling
- 911 Service
- Directory & Operator Services

## What type of discounts are available?

- **Lifeline** assistance lowers the cost of basic monthly local telephone service. Thanks to Federal and State support, eligible consumers can receive **\$12.75** per month in discounts. Lifeline is available on one telephone line per household and is nontransferable.
- **Toll Denial Service (TDN)** allows eligible consumers who wish to avoid incurring long distance fees to choose toll blocking **at no cost** if qualified for LITAP.

If you have additional questions about the information contained in this brochure, please contact our customer service representatives at **575.748.1241, 1.800.505.4844** or the Consumer Relations Division of the New Mexico Public Regulation Commission (NMPRC) at **1-888-427-5772**.

## How do I know if I am eligible?

PVT follows FCC supported guidelines and is subject to state regulations. Individuals are eligible if participating in one of the following programs:

- Federal Public Housing Assistance or Section 8
- Low Income Home Energy Assistance Program (LIHEAP)
- Medicaid
- National School Lunch free lunch program
- Supplemental Nutrition Assistance Program (formerly Food Stamps)
- Supplemental Security Income (SSI)
- Temporary Assistance for Needy Families (TANF)
- Household income is at or below 135% of the federal poverty guidelines

In addition, you may qualify for telephone assistance based on the size and income level of your household. See reverse side for guidelines.



492270NM3010

Peñasco Valley Telephone Cooperative, Inc.  
Study Area: 49-2270

Milestone Certification

Pursuant to 47 C.F.R. § 54.202(a) Peñasco Valley Telephone Cooperative, Inc. ("PVT") provides this certification that it is taking reasonable steps to provide upon reasonable request broadband speeds of at least 4 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to offerings in urban areas as determined in an annual survey as specified in Public Notice DA 15-470, and that requests for such service are met within a reasonable amount of time.

PENASCO VALLEY TELEPHONE COOPERATIVE, INC.

LINE 3017: RUS REPORTS

492270NM3017

**REDACTED IN ENTIRETY**